



Food and Nutrition  
Service

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September 8, 2021

**SUBJECT:** Pandemic Electronic Benefits Transfer Program (P-EBT)  
Approval of Wyoming's State Plan for Children in Schools and Child Care

**TO:** Cheryl Kennedy  
Regional Administrator  
Mountain Plains Regional Office

The Families First Coronavirus Response Act (P.L. 116-127; the Act) as amended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) and the Consolidated Appropriations Act, 2021 (P.L. 116-260) authorized a temporary assistance program for households with children without access to meals in school and to certain SNAP-enrolled children in child care during the public health emergency declared on January 27, 2020. Pursuant to the authority granted under Section 1101 of the Act, FNS approves Wyoming's enclosed plan to operate P-EBT for children in schools and child care.

### **Summary of State's Plan**

The Wyoming Department of Family Services and the Wyoming Department of Education will issue P-EBT benefits through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to households with eligible children. The State's plan for school children covers the months of August 2020 through May 2021. The State's plan for SNAP-enrolled children in child care covers the months of October 2020 through May 2021.

School children are eligible for benefits if they would have received free or reduced price meals at their schools through the National School Lunch Program (NSLP) if not for the closure or reduced attendance or hours of their schools for a period of at least 5 consecutive days. Children in child care are eligible if they are enrolled in SNAP and their child care facility is closed or operating with reduced attendance or hours, or if they live in the area of a school that is closed or operating with reduced attendance or hours. The State will use the best feasibly available data and USDA-approved simplifying assumptions to issue benefits in amounts that are tied as closely as possible to the number of days that eligible children do not receive a meal service through their schools or child care providers.

### **Children in Schools**

The State and its school districts will identify children eligible for free or reduced price NSLP meals using the most current available data. All school districts that rely on SY 2019-2020 eligibility data will have a means to address that they do not issue benefits to last year's graduates and non-students, and will offer households with new students the ability to establish their eligibility through the traditional school food authority-run school meal application and direct certification processes.

In addition, Wyoming has or will:

- identified 6 school districts that operated fully virtual or hybrid schedules for some of their schools for an extended period of time:
  - this includes 4 tribal districts that operated fully virtually and 2 districts with some schools that operated on a 3-day-per week virtual schedule,
  - the state will issue benefits for students in the affected schools at a fixed virtual or hybrid rate, as applicable, for the months that these schools were closed or operating with a hybrid schedule,
  - the virtual benefit will equal 19.5 days per month (where August and September are counted as one month); this is equal to the number of instructional days in the year divided by 9 benefit months,
  - the hybrid benefit is equal to 3 virtual days per week (12 days per month), which is the state-defined “Tier 2” schedule used by the 2 school districts with hybrid schedules,
- identified 2 additional districts where schools were closed for shorter periods of at least 5 consecutive days; the state will issue benefits to the students in these schools for the actual number of days that their schools were closed,
- collect individual student-level counts of virtual learning days in the Fall of 2021 from each of the state’s public and private school districts; this will capture virtual learning days of individual students based on student need outside of the school-wide virtual or hybrid schedules described above:
  - school districts will provide student-level counts of virtual days only for students who received virtual instruction from their NSLP-participating schools; students who attended a non-NSLP-participating virtual school, whether operated by the state or the school district, are not eligible for P-EBT,
  - the state will issue P-EBT benefits for the actual number of virtual days for each eligible student,
- tentatively issue benefits for school-based closures within 31 days of plan approval, with a second issuance in the case of necessary corrections. Benefits will be issued to all other eligible students identified in late 2021.

### **Children in Child Care**

At a minimum, the State will identify all children under age 6 who are enrolled in SNAP at any time since October 1, 2020. The State will not issue child care benefits to any child for months after their SNAP enrollment ends. Finally, the State will ensure that children who receive a benefit through P-EBT’s child care component do not also receive a benefit through P-EBT’s school component for the same month.

In addition, Wyoming has or will:

- confirmed that state-issued, participation-based, child care assistance payments were lower in every Wyoming county in every month from October 2020 through May 2021, compared with the same month in fiscal year 2019:

- this data confirms all SNAP-enrolled children in the state under age 6 are eligible for P-EBT benefits in each month from October 2020 through May 2021,
- issue a benefit in each month from October through May equal to the statewide average P-EBT benefit issued to school children who received a P-EBT benefit in the same month with one exception:
  - children in the one county where some schools operated fully virtually from the beginning of the school year through January will receive a benefit equal to 19.5 days per month for the months of October through January,
- make the simplifying assumption that SNAP-enrolled children who were under age 6 in October 2020 remain enrolled in a covered child care facility as 6-year-olds through May 2021,
- tentatively issue benefits within 31 days of completing a student-level data collection for the 2020-2021 school year.

Finally, the State will identify risks for improper payments and ensure a high level of integrity.

#### **Estimated Caseload and Value of P-EBT Benefits**

The State will calculate monthly benefits for each eligible child in the household equal to the daily reimbursement for a free breakfast, lunch, and snack multiplied by the number of benefit days calculated as described in the State's plan.

- Wyoming estimates that it will issue \$2.1 million to a minimum of 8,200 school children for school closures and reductions in attendance and hours extending from August 2020 through May 2021.
- Wyoming estimates that it will issue \$3.3 million to approximately 5,000 SNAP-enrolled children in child care from October, 2020 through May 2021.

#### **Release of Information**

Pursuant to Section 1101(e) of the Act, the Secretary hereby authorizes the release of the information necessary to carry out P-EBT in Wyoming. Section 1101(e) of the Act states, "Notwithstanding any other provision of law, the Secretary of Agriculture may authorize State educational agencies and school food authorities administering a school lunch program under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.) to release to appropriate officials administering the supplemental nutrition assistance program such information as may be necessary to carry out this section."

#### **Plan Timetable and Revisions**

Wyoming will distribute benefits to households consistent with the timeframes identified in the State plan. Should the State encounter challenges or delays that significantly impair its ability to implement the approved P-EBT plan or require substantive changes, the State must notify the FNS Regional Office as soon as possible.

The FNS Regional Office will work with the State to identify reasonable solutions and review revised plans for approval or further revision.

**Civil Rights**

Wyoming will continue to comply with civil rights requirements, to include providing equal access to individuals with disabilities and individuals who are limited English proficient.

**Administrative Funds**

The Wyoming Department of Family Services will participate in a P-EBT Administrative Budget Planning process using the FNS-366(a) Program and Budget Summary. When the FNS-366(a) is finalized, that will determine the State's Administrative Grant level. However, the FNS-366(a), Program and Budget Summary, may be updated and revised as the State's operational plan evolves.

**Reporting**

The Wyoming Department of Family Services will complete the FNS-292B, the FNS-46, the FNS-388, and the FNS-778 reports in accordance with existing requirements.

FNS appreciates Wyoming's commitment to meet the nutritional needs of children during a challenging time. If you have questions, please contact the FNS Mountain Plains Regional Office.

Sincerely,

Cindy Long  
Deputy Administrator  
Child Nutrition Programs